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HON. RANDOLPH JACKSON
JUSTICE NYS SUP. CT. (RET.)
OF COUNSEL

December 11, 2018

Via ECF

Magistrate Judge Steven L. Tiscione
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Janine Linton v. Frontier Airlines, Inc.*
Civ. Case #: 18CV00044

Dear Judge Tiscione:

Please be advised that my firm recently substituted the Jackson Legal Group, P.C. as attorney for plaintiff, Janine Linton, in this matter, having filed my Appearance and Consent Order Granting Substitution of Attorney yesterday. We are in the process of transferring the file from Ms. Jackson's office and hope to complete the process expeditiously. Under the circumstances, this letter will serve as plaintiff's request for an additional 30 day extension of the discovery deadlines set forth in Your Honor's Order dated November 19, 2018.

Specifically, it is requested that the deadline for the exchange of expert reports be extended to January 18, 2019; expert depositions completed by February 20, 2019; all discovery completed by February 28, 2019; and the final date to begin dispositive motion practice to March 28, 2019. I have contacted defense counsel Michael Crowley who has consented to the foregoing.

Thank you for your attention and understanding in this matter.

Respectively yours:

Eric M. Babat

cc: Michael Crowley, Esq. (By ECF)
Michael Bojbasa, Esq.
Attorneys for Defendant Frontier Airlines
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